

1 **SHAFFY MOEEL**  
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11 UNITED STATES DISTRICT COURT  
12 SOUTHERN DISTRICT OF CALIFORNIA  
13  
14 **(HONORABLE MARILYN L. HUFF)**

15 UNITED STATES OF AMERICA, ) CASE NO. 08CR0884-MLH  
16 )  
17 Plaintiff, ) DATE: May 19, 2008  
18 ) TIME: 2:00 p.m.  
19 v. )  
20 ) NOTICE OF MOTIONS AND MOTIONS  
21 JESUS MARROQUIN-FRIAS, ) TO:  
22 )  
23 Defendant. ) (1) PRESERVE EVIDENCE AND  
24 ) COMPEL PRODUCTION OF  
25 ) DISCOVERY; AND  
26 ) (2) GRANT LEAVE TO FILE  
27 ) FURTHER MOTIONS.  
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19 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY;  
20 DAVID LESHNER, ASSISTANT UNITED STATES ATTORNEY:

21 PLEASE TAKE NOTICE that on May 19, 2008 at 2:00 p.m., Jesus Marroquin-Frias, by and  
22 through his attorneys, Shaffy Moeel and Federal Defenders of San Diego, Inc., will ask this Court to enter  
23 an order granting the following motions:

24 (1) compelling discovery and preservation of evidence; and  
25 (2) granting leave to file further motions.

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These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: May 13, 2008

*/s/ Shaffy Moeel*  
**SHAFFY MOEEL**  
Federal Defenders of San Diego, Inc.  
Attorneys for Mr. Marroquin-Frias